Audit Summary of Audit Activity for all Providers and for Schools

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| Fiscal Year |  | Audits | Audits / OP | Overpayments | CivilMonetaryPenalty |
| FY 17FYTD Dec | All | 259 | 132 | $3,929,434  | $904,824 |
| School | 11 | 7 |  $379,488  |  $5,484  |
| FY 16 | All | 557 | 194 | $4,506,354 | $1,037,259 |
| School | 12 | 6 |  $99,193  |  $0 |
| FY 15 | All | 472 | 172 | $2,464,004 | $732,029 |
| School | 6 | 4 | $99,431 | $0 |

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| Fiscal Year |  | Overpayments | CivilMonetaryPenalty |
| FY 2014 | All | $2,353,962 | $875,474 |
| School | $24,138 | $0 |
| FY 2013 | All | $2,559,502 | $873,960 |
| School | $132,868 | $27,165 |
| FY 2012 | All | $1,273,214 | $312,565 |
| School | $478,972 | $17,824 |

Summary of Top 10 (Highest Overpayments) Audits for Fiscal Years 2015 through 2017 Year To Date as of December 31st, 2016.

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| SFY | School | Case # | Source | OP | CMP | Scope of Audit |
| 2017 | New Plymouth School District | 70431 | Anonymous complaint | $158,478.23 |  | Audited 26 student records for 27-month period.* All services audited
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| 99% of audited services had findings* 24 students had services provided by unqualified speech therapists
* 7 students had services billed without required documentation
* 107 services that were too old to bill were billed with false dates of service and then after claims were paid, the claims were corrected to show the correct dates of service
* 9 students had services when students were absent or the person providing the service was absent
* 8 students weren’t eligible for services billed
* 2 students had services billed when there weren’t valid IEPs
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| 2017 | Oneida School District | 70774 | Parent complaint | $114,431.82 | $5,435.90 | Audited 16 student records for 16-month period* Limited review of eligibility
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| * 11 of 15 students did not have required assessments to determine if students were eligible for behavior intervention services
* 4 students did not have required assessments to determine if students were eligible for personal care services
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| 2016 | Bear Lake County School District 33 | 70359 | Special study of excessive units | $97,406.38 |  | Audited 10 student records for 28-month period* All services audited
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| 97% of audited services had findings* All 10 audited students had nearly $40,000 worth of payments for transportation and escort services that were billed when no medical services were provided. Some of the IEPs stated that the only reason student received transportation services was because it was the only way the student could get home. The school billed Medicaid for as much as 14-months’ worth of transportation and attendant care when the student received no Medicaid service, which is the condition for payment.
* One attendant’s time was billed for multiple students after Medicaid instructed school not to bill this way
* 6 out of 10 students had services billed that weren’t listed on IEPs. Some services were billed for as long as 7 months
* Speech therapy was billed when records showed the student was on a field trip and attending ice cream party
* Individual and group intervention services were billed when records indicate the student was sleeping or resting
* 6 of the 10 students had services billed without physician orders. In one case, the physician order was altered by the school after it was sent the first time
* Employee documented providing individual services to one student during the same time period employee documented providing individual or group to other students
* Speech therapist documented speech therapy during same time student received behavior intervention services
* More services were billed than documented
* More services were billed than authorized on the IEP
* Services were billed without service plans
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| 2017 | Taylor’s Crossing Public Charter School | 70069 | Employee complaint | $93,229.97 |  | Audited 6 student records for 9-month period* Audit limited to behavior intervention (no other service billed)
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| 100% of audited services were not reimbursable* All audited students did not have required assessments to determine if students were eligible for behavior intervention services
* Services were provided by unqualified staff
* This school was out of compliance in multiple areas but these deficiencies weren’t cited in the findings notice because the students didn’t have assessments to determine eligibility. A meeting was held with the special ed director and superintendent to make sure they were aware of all other deficiencies
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| 2015 | Bonneville School District # 93 | 69782 | Special study of school-based services | $73,891.79 |  | Audited 36 student records for 6-month period* All services audited
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| Overlapping servicesBilling for absent studentsUnits billed exceeded IEPMissing, incomplete or illegible documentationBilled more units than documentedBilled interpretive services when no medical services were providedMissing physician referralServices billed not covered by IEP |
| 2015 | Bonneville School District # 93 | 70446 | Special study of interpretive services | $21,306.00 |  | Audited 1 student’s records for 4-month period* Limited audit of interpretive services
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| * School asked to conduct self-audit after previous audit identified concerns about interpretive services billings
* Billed interpretive services when no medical services were provided
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| 2017 | Cassia Joint School District # 151 | 70544 | Parent complaint | $8,550.89 |  | Audited 6 student records for 8-month period* All services audited
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| * 1 of 6 students had multiple instances of more units billed than documented
* 2 of 6 students had multiple instances of billing more units than allowed on IEP
* 3 of 6 students had multiple instances of services billed that weren’t listed on IEP
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| 2017 | Independent School District of Emmett | 70075 | Special study of interpretive services | $3,712.58 |  | Audited 10 student records for 12-month period* All services audited
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| Overlapping services* 5 out of 10 student records had instances of services that overlapped with other therapy during the same time period
* 1 out 1 student receiving interpretive services had services billed when no medical services were provided
* 2 out of 10 student records had instances of services billed that weren’t listed on IEP
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| 2015 | Idaho Falls School District 91 | 70365 | Special study of interpretive services | $2,175.00 |  | Audited 3 student records for 23-month period* Limited audit of interpretive services
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| * All audited school records had instances of non-covered services
* 2 out of 3 student records had interpretive services when no medical services were provided
* 2 out of 3 student records had more interpretive services than the service provided
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| 2015 | County of Boise 71 Garden Valley | 69405 | Special study of school-based services | $2,058.53 |  | Audited 10 student records for 2 month-period* All services audited
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| 6 out of 10 student records had findings* 2 out of 10 student records had more units billed than documented
* 2 out of 10 student records had multiple instances of billing academic services as medical services
* 3 out of 10 student records had more units billed than authorized on IEP
* 1 out of 10 student records had services billed that weren’t listed on IEP
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